

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

VALDEMARAS CEINORIUS,  
VITALIJ CHRISONOPULO,  
FIODOR IGNATOV,  
VIKTOR KUZNECOV,  
ANATOLIJ MATVEJEV,  
NIKOLAJ NIKULIN,  
VALERIJ POTAPOV, and  
VLADIMIR ULJANOV,  
Plaintiffs

V.

ARTHUR FRANCO and  
JOHN G. HADAYIA,  
Defendants

Civil Action

No. 03-CV-12270-RWZ

MOTION FOR DEFAULT OF DEFENDANT HADAYIA

NOW COME the Plaintiffs and states as follows:

1. Service was made on Defendant Hadayia on December 22, 2003. Return of service was made to the Court by letter dated January 13, 2004.
2. Defendant Hadayia has not answered the Complaint. The Plaintiff has not granted Defendant Hadayia any extension of time to answer the Complaint.
3. Defendant Hadayia is, upon information and belief, not in the United States military, and thus not eligible for relief under the Soldiers and Sailors Relief Act.

WHEREFORE, the Plaintiffs respectfully request that a default be entered against Defendant John G. Hadayia.

Respectfully submitted for the Plaintiffs,  
by their attorney,

A handwritten signature in black ink, appearing to read 'David J. Berg', is written over a horizontal line.

David J. Berg, Esq.  
Latti & Anderson LLP  
30-31 Union Wharf  
Boston, MA 02109  
617-523-1000